



3. Defendants shall identify and disclose all expert witnesses and reports on or before **February 4, 2016**.
4. Rebuttal experts and reports, if any, shall be identified and disclosed on or before **February 18, 2016**.
5. The Parties shall depose all expert witnesses on or before **March 10, 2016**.
6. The Parties shall file a joint mediation report on or before **February 25, 2016**.
7. The Parties shall file all dispositive motions on or before **April 7, 2016**. Responses to dispositive motions shall be filed within **twenty-one (21) days** after the filing of the motion. Optional replies shall be filed within **fourteen (14) days** after filing of the response.

The proposed amended dates will require a new trial date to comply with Local Rule 16.01, requiring at least ninety (90) days between the deadline for a reply to a dispositive motion and the trial date. (*See* LR 16.01(d)(2)(f)). After consultation among counsel for all parties, all parties consent to this motion and modification. The proposed order filed herewith reflects the requested changes.

Respectfully Submitted,

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all counsel of record by ECF on September 9, 2015.

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